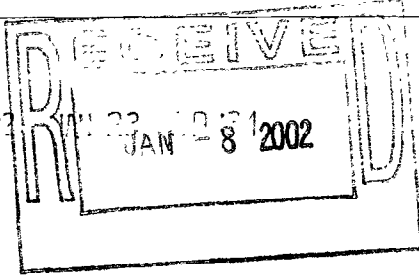


Natural Factors Nutritional Products Inc.



December 3, 2001

Food and Drug Administration
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
200 C St. SW
Washington, DC 20204

Dear Sir or Madam:

This is to provide the required information to comply with our obligation under DSHEA labeling regulations.

Supplement: Panax Ginseng Phytosome™

Manufacturer, packer: Natural Factors Nutritional Products, Ltd.
1550 United Blvd.
Coquitlam, B.C.
Canada V3K 6Y7

Distributor: Natural Factors Nutritional Products, Inc.
1111 80th St. SW, Suite 100
Everett, WA 98203

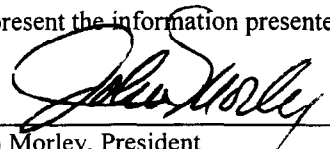
Text of side Panel: Natural Factors Panax Ginseng Phytosome™ contains a standardized, concentrated extract of Panax Ginseng C.A. Meyer bound to phosphatidylcholine (from lecithin) to significantly enhance bioavailability. Each easy-to-swallow softgel has a naturally balanced ratio of the key Ginsenosides, Rg1 and Rb1, standardized to a minimum of 7%. Many clinical studies indicate that ginsenosides are responsible for Ginseng's worldwide reputation as a superior health, longevity and well being herb. Perhaps most significant is clinical research suggesting its value as a natural adaptogen; promoting resistance to environmental stress.*

Text of PDP: PROMOTES ADAPTOGENIC FUNCTION AND RESISTANCE TO STRESS*

Name of dietary ingredient that is the subject of statement: Panax Ginseng

Name of dietary supplement: Panax Ginseng Phytosome™ 50mg

I represent the information presented to be accurate and in compliance with supplement label regulations.


John Morley, President

12/10/01
Date

1111 80th Street S.W., Suite 100
Everett, WA, USA 98203
Phone: (425) 513-8800
Fax: (425) 348-9050

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